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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EFFAT S. EMAMIAN

Plaintiff,

-against-

ROCKEFELLER UNIVERSITY,

Defendant.

Civil Action No.
07 CV 3919 (DAB)

**DECLARATION OF
BETTINA B. PLEVAN, ESQ.**

BETTINA B. PLEVAN, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of Proskauer Rose LLP, attorneys for Defendant
Rockefeller University (“Rockefeller”). I submit this declaration in support of Rockefeller’s
Motion to Dismiss the Seventh and Eighth Claims of the Amended Complaint.

2. Annexed hereto as Exhibit 1 is a true and correct copy of the Amended
Complaint, filed on or about June 7, 2007.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
August 10, 2007



Bettina B. Plevan